

## REMARKS/ARGUMENTS

Applicants acknowledge receipt of the Office Action dated May 31, 2006. Claims 1-4, 6-12, and 16-21 are pending in the application. Claims 1-4, 6-12, and 16-21 are rejected under 35 U.S.C. §103 as being unpatentable over *Bleys*, U.S. Patent No. 5,521,226 ("*Bleys*"); *Bleys et al.*, U.S. Patent No. 5,591,779 ("*Bleys et al.*"); or *Eling et al.*, U.S. Patent No. 5,773,483 ("*Eling*") each in view of *Oertel*, *Polyurethane Handbook: Chemistry - Raw Materials - Processing Application - Properties* ("*Oertel*"). Applicants believe all pending claims are allowable over the art of record and respectfully request reconsideration and allowance of all pending claims.

### I. **Claims 1-4, 6-12, and 16-21 are patentable over *Bleys*, *Bleys et al.*, or *Eling* in view of *Oertel*.**

Applicants respectfully traverse the Examiner's rejections of claims 1-4, 6-12, and 16-21 under § 103 as being unpatentable over *Bleys*, *Bleys et al.*, or *Eling* in view of *Oertel*. Applicants submit that, contrary to MPEP section 2143, the Examiner has failed to make a *prima facie* case of obviousness in rejecting such claims in that the Examiner has failed to cite references that teach or suggest all of the elements in the rejected claims.

Claim 1 is an independent claim upon which claims 2-4, 6-12, 17, 19, and 21 depend. Claim 16 is an independent claim upon which claims 18 and 20 depend. Claim 1 recites that "an external mould release agent is applied onto at least those surfaces of the mould," and claim 16 recites "applying an external mold release agent onto at least one surface of a mold." In addition, claim 1 recites that "steps 2, 3, and 4 are repeated at least 10 times without repeating step 1," and claim 16 recites "repeating steps 2, 3, and 4 at least 10 times without repeating step 1." Nothing in *Bleys*, *Bleys et al.*, or *Eling* teach or suggest such recitations. For instance, the Examiner notes that "the primary references are silent regarding applicants' claimed process of coating the mold with an external release agent and producing at least 10 moldings prior to recasting the mold with the external release agent" (Office Action, pg. 3, lns. 1-3).

*Oertel* cannot supply the missing recitations to *Bleys*, *Bleys et al.*, or *Eling* because *Oertel* does not teach or suggest all recitations of claims 1 and 16. For instance, *Oertel* does not teach or suggest that an external mould release agent is applied to the surface of the mould and that steps 2, 3, and 4 are repeated at least 10 times without repeating step 1. Instead, *Oertel* merely teaches applying a release agent to a mold. (*Oertel*, pg. 114, Section 3.4.9). *Oertel* further

teaches that applying the release agent "extends the production cycle but leads, in the course of production, to a build-up of release agent in the mold, which must be removed mechanically or by means of a solvent." (*Oertel*, pg. 115, Section 3.4.9, emphasis added). This teaching does not reach or suggest the recitations of claims 1 and 16, but instead teaches away from such recitations. For instance, advantages of the recitations of claims 1 and 16 over conventional means as in the teachings of *Oertel* are specifically discussed in the present specification. (Present Application, pg. 2, lns. 12-21) Such advantages include a reduced build-up, which is a specifically discussed drawback to the teachings of *Oertel* as noted. (Present Application, pg. 2, lns. 12-21)

Applicants note the Examiner has set forth that "*Oertel* further discloses that use of the release agent extends the production cycle, which suggests that multiple moldings are produced per mold release application." (Office Action, pg. 3, lns. 6-8) Applicants respectfully submit that extending the production cycle as disclosed in *Oertel* does not make such a suggestion as set forth by the Examiner. Instead, Applicants submit that such teachings of *Oertel* refer to the reduced need to remove polyurethane parts that have been left behind on the mold surface after removal of the polyurethane from the mold. To further exemplify these points, Applicants submit the following publications attached hereto in the Appendix: George Woods, *The ICI Polyurethanes Book*, pgs. 71-75 (1987) ("*Woods*"); and Herrington et al., *Dow Polyurethanes "Flexible Foams,"* pgs. 5.30-5.34 (1997) ("*Herrington*"). These publications relate to similar type processes as disclosed in *Oertel*. In such regards, *Woods* discloses a mould carousel with a wax release spray compartment by which the release spray is applied with every production cycle. (*Woods*, pg. 72, last 4 lns., Fig. 4-16) The disclosure of *Herrington* further supports Applicants' point. For instance, *Herrington* specifically discloses that the release wax "must be renewed after each molding." (*Herrington*, pg. 5.30, last ln.) In addition, *Herrington* discloses that after the foam is removed, the molds are then cleaned and "sprayed with fresh mold-release." (*Herrington*, pg. 5.31, last para., emphasis added) Moreover, *Herrington* provides figures that disclose the production cycle having strip, clean, and wax stations. (*Herrington*, Figs. 5.20, 5.21) As a specific example, *Herrington* provides a production cycle with a "tidder/mold and wax" process step that takes 6.0 minutes. (*Herrington*, pg. 5.31, Table 5.4) Therefore, it can be seen from the similar production cycle disclosures of *Woods* and *Herrington* that *Oertel* does not make the suggestion as set forth by the Examiner.

Accordingly, Applicants respectfully request that the Examiner withdraw the § 103 rejections and allow claims 1 and 16. Since independent claims 1 and 16 are submitted to be allowable, dependent claims 2-4, 6-12, and 17-21 must *a fortiori* also be allowable as they carry with them all the limitations of claims 1 and 16.

## II. Conclusion

Applicants respectfully request reconsideration, allowance of the pending claims and a timely Notice of Allowance be issued in this case. If the Examiner feels that a telephone conference would expedite the resolution of this case, the Examiner is respectfully requested to contact the undersigned.

In the course of the foregoing discussions, Applicants may have at times referred to claim limitations in shorthand fashion or may have focused on a particular claim element. This discussion should not be interpreted to mean that the other limitations can be ignored or dismissed. The claims must be viewed as a whole, and each limitation of the claims must be considered when determining the patentability of the claims. Moreover, it should be understood that there may be other distinctions between the claims and the prior art that have yet to be raised but which may be raised in the future.

Respectfully submitted,



Tod J. Turney  
P/O Reg. No. 47,146  
TURNLEY LLP  
P.O. Box 22188  
Houston, TX 77227-2188  
(713) 622-7005 (Phone)  
(713) 622-0220 (Fax)  
ATTORNEY FOR APPLICANTS